

Appendix 8

Fraud Prevention and Investigation Program Plan Requirement

DHS Fraud Prevention and Investigation Program Plan Requirement

In order for DHS to secure federal financial participation and limit exposure to potential litigation, local agencies must structure their FPIP operations according to staffing and procedural requirements as set forth in the FPIP guidelines. Each calendar year agencies must provide or update an FPIP Plan with DHS according to the language contained in the most current Administrators Memo or IM contract.

Once approved, these FPIP Plans serve as the legal basis for DHS approval and funding of agency FPIP operations. In addition to the FPIP Plan, DHS may also request additional information on local agencies fraud prevention and investigation operations such as:

- Position descriptions of agency FPIP staff, to include a break out and percentage of time spent on FPIP-related tasks.
- Agency organizational chart identifying the location and reporting relationships of the FPIP staff within the agency.
- Copies of all contractual agreements with providers of investigation and prosecution services.

The template for the FPIP Plan is attached.

FRAUD PREVENTION & INVESTIGATION PROGRAM PLAN
Department of Health Services

2011 FPIP PLAN

This Plan is for the operation of a Calendar Year 2011 Fraud Program Fraud Prevention and Investigation Program. The Program will be administered by the agency identified below:

Name of Local Agency	
Mailing Address	
City State Zip Code	
Contact Person and Title	
Telephone Number	
E-mail Address	

The 2011FPI Program will be supervised by the individual identified below:

Supervisor Name and Title	
Telephone Number	
E-mail Address	

ATTACHMENT A
MODEL POSITION DESCRIPTION FOR FPI POSITION

Job Summary:

Under the direct supervision of the ES Supervisor, this position shall function as the agency's Fraud Prevention Investigator (FPI).

Position Responsibilities

- 70% A. Conduct timely and thorough fraud prevention investigations upon receipt of referrals
 1. Maintain a log of all investigation referrals made by ES staff and others.
 2. Determine if the referral meets the agency's error-prone profile and investigation criteria.
 3. Identify what error-prone elements are involved in the referral and develop an investigation plan.
 4. Conduct the investigation within the agency's specified time frame in accordance with the FPIP Guidelines and IMM Chapters 11-13.
 5. Document all investigation findings.
 6. Report investigation findings to the ESS/ES Supervisor.
 7. Ensure that appropriate action is taken in response to findings.
 8. Take lead in pursuing administrative hearings regarding the investigation and its findings.

- 10% B. Serve as agency's gatekeeper
 1. Review all FPIP referrals for appropriateness and priority.
 2. Ensure that all required investigation data is entered on CARES.
 3. Complete all records required for local, state and federal record keeping and reporting requirements.
 4. Coordinate ADH hearings process for agency.
 5. Cooperate with local DA in prosecution of public assistance fraud cases initiated by the agency.

- 10% C. Provide fraud detection and referral training to county/tribal IM/W-2 eligibility workers and supervisors
 1. Assist staff to understand the FPIP process.
 2. Assist staff to identify cases that should be referred.
 3. Show staff how to refer cases on the BVIR screen.

- 10% D. Cooperate with DHS on implementation of FPIP procedures
 1. Comply with FPI Guidelines, CARES reporting guidelines and Program policies.
 2. Inform agency of FPI Program progress.
 3. Assist agency in development of agency's FPIP Plan.

ATTACHMENT C
CONTRACTED INVESTIGATION SERVICES REQUIREMENTS

References:

WI Stat. 440.26

Administrative Code Chapter RL 30, 31, 32, 33, 34 and 35

Commercial agencies which contract with counties or tribes to provide fraud prevention investigative services are subject to the Wisconsin Statute and Administrative Code requirements for private detectives. These requirements do not apply to off-duty law enforcement officers or public officers performing official duties, including law enforcement officers. Private individuals, including former law enforcement officers, must meet these requirements. See DES Administrator's Memo 90-39.

Counties or tribes deciding to contract with private agencies or individuals for investigative services need to obtain a copy of WI Statute 440.26 and Administrative Code Chapter RL 30, and require that the individual meet the private detective requirements for licensure, training and liability.